

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

Case No. 10-08492-BKT

RAVICO OF PUERTO RICO, INC.

Chapter 7

Debtor.

**TRUSTEE'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION TO COMPEL ABANDONMENT**

TO THE HONORABLE COURT:

COMES NOW the Trustee, NOREEN WISCOVITCH-RENTAS, and moves the Court for an extension of time to object to respond to Banco Bilbao Viscaya Argentina-Puerto Rico ("BBVA")'s Motion to Compel Abandonment and in support, states:

1. On September 15, 2010, the Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code. The undersigned is the duly appointed Chapter 7 Trustee.
2. On October 12, 2010, a Motion to Dismiss was filed (Dkt. No. 16). The same was later amended (Dkt. No. 21). The Motion to Dismiss has been responded by Debtor's Counsel and the undersigned (Dkt. Nos. 18 and 23).
3. The Court has not ruled on the Motion to Dismiss.
4. At the Debtor's premises, the inventory of Ravico (Tires) are being stored. The Tire inventory are the object of a security interest held by BBVA.
5. BBVA has not paid rent for the storage and insurance of the tires to the Estate since the filing of the Petition. Further, no motion for relief from Stay has been filed by BBVA to pursue execution of its security interest.

6. The Trustee needs additional time to object to BBVA's Motion. At this time, the Motion to Dismiss has not been decided. An abandonment, maybe pre-mature in the event the Court dismisses the case.
7. Further, BBVA's Motion lacks the required notice under Local Rule 9013-1(h)(2)(D).
8. An additional Thirty (30) days is requested from the date the Court rules on the Motion to Dismiss to respond to BBVA's Motion to Compel Abandonment.

WHEREFORE, Noreen Wiscovitch-Rentas, Chapter 7 Trustee, respectfully requests the Court to enter an Order extending the time to respond to BBVA's Motion to Compel Abandonment for 30 days after the Court rules on the Motion to Dismiss and for any further relief this Court deems just and proper under the circumstances.

I HEREBY CERTIFIED that a true and correct copy of the foregoing was sent to all parties subscribed to CM/EDF system, to the Debtor, its Counsel Wanda Luna, Esq. and BBVA's counsel William Santiago Sastre, Esq, at wsantiago@mpdjlaw.com on this 22nd day of November, 2010.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of November of 2010.

/s/ Noreen Wiscovitch-Rentas
NOREEN WISCOVITCH-RENTAS
CHAPTER 7 TRUSTEE
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